

EXHIBIT "A"

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 0:24-cv-60984-Rosenberg/Augustin-Birch

MELINDA MICHAELS,

Plaintiff,

v.

SEAWATER PRO LLC and MICHAEL SPANOS
a/k/a MIKE SPANOS,

Defendants.

**PLAINTIFF MELINDA MICHAELS' RESPONSE TO DEFENDANTS'
FIRST SET OF INTERROGATORIES**

1. Please state the name, title (if any), address, telephone number, and relationship to Plaintiff of any person answering or assisting in answering these interrogatories.

ANSWER:

Melinda Faith Michaels

c/o Koz Law, P.A., Plaintiff's counsel
800 East Cypress Creek Road, Suite 421
Fort Lauderdale, Florida 33334
(786) 924-9929

2. As to your alleged employment with SeaWater, please state the following:

- a) Name and position of the person who hired you.
- b) The position you were hired for.
- c) Your duties and responsibilities.
- d) Your rate of pay.
- e) Your corporate email address.

Alex Loebelenz – 954-288-2828. Ft. Lauderdale (address unknown). Mr. Leobelenz performed work at Defendants’ warehouse and witnessed Plaintiff working for the Defendants on a daily basis. Mr. Leobelenz has knowledge that Plaintiff was not getting paid properly, and that Plaintiff was owed money by the Defendants.

Melina Loebelenz – 954-204-8924. Ft. Lauderdale (address unknown). Mrs. Leobelenz witnessed Plaintiff coming and going on a daily basis from the Defendants. Mrs. Leobelenz has knowledge that Plaintiff was not getting paid properly, and that Plaintiff was owed money by the Defendants.

4. State the amount of damages you are seeking in this action through the date of your response. Include your calculations and a detailed description of how you arrived at the amount, and itemize each component of damages you are seeking.

ANSWER:

Total Unpaid Minimum Wages = \$81,580.89 = \$10.00 Minimum Wage Hourly Rate × 37 Average Weekly Hours Worked × 38.86 Weeks + \$8.65 Minimum Wage Hourly Rate × 37 Average Weekly Hours Worked × 29.71 Weeks + \$8.65 Minimum Wage Hourly Rate × 91 Average Weekly Hours Worked × 8.14 Weeks + \$8.56 Minimum Wage Hourly Rate × 91 Average Weekly Hours Worked × 52.29 Weeks + \$8.46 Minimum Wage Hourly Rate × 91 Average Weekly Hours Worked × 13.71 Weeks

Total Liquidated Damages = Total Unpaid Minimum Wages

5. Identify all written statements or transcriptions of oral statements relating to your claims that you, your attorneys, or anyone acting on your behalf have taken or received.

ANSWER:

None.

6. Identify any other legal proceeding, litigation, arbitration, mediation and/or administrative proceeding (including criminal matters) in which you have ever participated, and for each identify

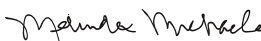
Plaintiff estimates that she received alimony that fluctuated from approximately \$1500 / month and \$1840 / month during that period.

13. Identify all withdrawals and personal transactions you made from any joint account you had with Spanos during the period from January 1, 2019 through December 31, 2022.

ANSWER:

Plaintiff does not recall withdrawing money from the joint account with the Defendant Spanos during that period. However, the Defendant Spanos did have Plaintiff's car insurance on autopay through that account, as Plaintiff was using her own personal vehicle to transact business for the Defendants.

I declare under penalty of perjury pursuant to 28 U.S. Code § 1746 foregoing is true and correct to the best of my knowledge and belief.



MELINDA MICHAELS
12 / 02 / 2024

Date

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of December 2024, a true and correct copy of Plaintiff Melinda Michaels' Response to Defendants' First Set of Interrogatories was served by email on all counsel or parties of record on the Service List below.

/s/ Dillon S. Cuthbertson
Dillon S. Cuthbertson, Esq.
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